



**VALENCIA WASTE MANAGEMENT LTD**

**FOXHALL LANDFILL, SUFFOLK – APPLICATION TO VARY PERMIT NUMBER  
EPR/BW2943IG**

**AMENITY AND ACCIDENT RISK ASSESSMENT**

**JUNE 2024**

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## CONTENTS

1	INTRODUCTION .....	1
2	ACTIVITIES AT THE SITE .....	1
3	SENSITIVE RECEPTORS.....	2
4	RISK ASSESSMENT .....	3
5	CONCLUSION .....	9

<b>DRAWINGS</b>	<b>TITLE</b>	<b>SCALE</b>
FOX-MRF001	Materials Recycling Facility Layout	1:500 @ A3
ST20399-002	Foxhall MRF Receptor Plan	1:10,000 @ A3

## **1 INTRODUCTION**

- 1.1.1 Wardell Armstrong have been instructed to prepare an application to vary the permit for Foxhall Landfill at Brightwell, Suffolk. The site is operated by Valencia Waste Management Ltd (Valencia) under permit number EPR/BW2943IG.
- 1.1.2 Valencia is seeking to move waste up the waste hierarchy by manually sorting mixed non-hazardous waste arriving at the landfill to recover metals and wood for recycling. Wastes suitable for reuse as landfill cover or road maintenance will also be recovered from the mixed waste. The residual wastes will be placed in the landfill.
- 1.1.3 This Amenity and Accident Risk Assessment identifies the potential environmental hazards that may arise through activities carried out at the new Material Recycling Facility (MRF). This document also sets out the mitigation measures that will be implemented to protect the local population and environment. The risk assessment follows the source-pathway-receptor model, as outlined in the Environment Agency guidance on 'Risk Assessments for your Environmental permit'.
- 1.1.4 The activities to be carried out at the MRF are described in section 2, and the location of sensitive receptors in proximity to the site are set out in section 3.
- 1.1.5 The Accident and Amenity Risk Assessment is provided in Section 4. This sets out the potential risks from the activities on site (source), who may be affected (receptor) and how (pathway), the mitigation measures that will be implemented and an assessment of the overall risk. A summary of the risk assessment is provided in section 5.

## **2 ACTIVITIES AT THE SITE**

- 2.1.1 Up to 100,000 tonnes of mixed non-hazardous and inert wastes will go through the MRF annually.
- 2.1.2 Waste will be treated via a picking line to separate the metals and wood into discrete outputs ready for recycling, recovery or disposal.
- 2.1.3 Materials such as bricks, stones and glass which may be suitable for landfill cover or road maintenance will be separated and stored pending reuse.
- 2.1.4 Recyclable metal and wood outputs will be stored in dedicated containers or bays pending loading and removal to a permitted recycling site.
- 2.1.5 The layout of the MRF is shown on drawing FOX-MRF001.

### 3 SENSITIVE RECEPTORS

- 3.1.1 The Site is not considered to be located in a particularly sensitive location. The MRF building is located within the existing landfill boundary, to the east of the Site.
- 3.1.2 The Site is situated in open countryside 8km to the east of Ipswich Town Centre. The Site is bounded to the southeast by the A12 dual carriage way and to the north by Foxhall Road. To the western side of the site is woodland and to the south of the Site the land slopes down into the Mill River Valley.
- 3.1.3 The closest residential receptor is a property which lies 370m to the northeast. Beyond that lies Sheep Drift Farm and Sheep Drift Cottage. The closest commercial and industrial receptor is Brightwell Corner Agricultural Store and Storage Barns, located 160m to the east of the Site.
- 3.1.4 There are a number of protected habitats in the proximal surrounding area, the closest protected habitat is Ipswich Heaths SSSI, which has its closest point approximately 950m northwest from the Site. New Bourn Springs SSSI lies approximately 1.7k to the east and Waldringfield Pit SSSI lies 1.8k to the northeast. Multiple areas of protected deciduous woodland lie with 2km of the site, the closes area being 260m to the southeast. A Habitats Risk Assessment has also been prepared to assess the potential risk from the MRF to the sensitive habitats and species identified.
- 3.1.5 The sensitive receptors within 1km of the Site are shown on drawing ST20399-002 Receptor Plan, and receptors within 2km of the Site are also listed in Table 3.1 below.

Table 3.1: Sensitive Receptors within 2km of the Site		
Receptor	Receptor Type	Distance/Direction
Brightwell Storage/ Brightwell Corner Agricultural Store	Commercial	160m, east
Brightwell Hill Plantation	Environmental	260m, southeast
Deciduous woodland	Protected Habitat	260m, southeast
Pond	Environmental	370m, south
Residential property	Residential	370m, northeast
St John The Baptist's Church	Leisure	470m, southeast
Suffolk County Council HWRC	Commercial	500m, east
Openreach Telecommunications school	School/Commercial	512m north
Mill River	Environmental	540m, south

**Table 3.1: Sensitive Receptors within 2km of the Site**

Receptor	Receptor Type	Distance/Direction
Sheep Drift Farm House	Residential	610m, northeast
Martlesham Heath Residential area	Residential	610m, north
Martlesham Heath Residential area	Residential	610m, north
Foxhall Recycling Centre	Commercial	630m, west
Street Farm Cottage	Residential	660m, southwest
Dukes' Hill Wood	Environmental	700m, west
Ipswich Packaging Services	Commercial	700m, north east
A2-M Ltd. Fence contractor	Commercial	725m, north east
Tillio Race Prep Ltd, Car body shop	Commercial	750m northeast
Sheep Drift Cottage	Residential	860m, northeast
Lewis Cottage	Residential	940m, southwest
Ipswich Heaths SSSI	Protected habitat	950m, northwest
The Stables Coffee Shop and Sandwich Bar	Commercial	960m, north east
Birchwood Primary School	School	1.3km, north
Nursery cottages	Residential	1.3km, northwest
Hall cottage	Residential	1.4km, west
Playing field	Leisure	1.5km, northwest
Foxhall Hall	Residential	1.5km, west
Foxhall Court	Care home	1.7km, northwest
Newbourn Springs SSSI	Protected habitat	1.7km, east
Waldringfield Pout SSSI	Protected habitat	1.8km, northeast

## 4 RISK ASSESSMENT

4.1.1 For the receptors outlined in Table 3.1 above to be at risk there must be a source of pollution and a pathway by which that pollution can reach the receptor. Management of the risks will have two elements, reducing the source of pollution by good management of the site, for example by limiting the quantity of waste, and the period for which it is stored and placing control measures in place to break the pathway and prevent pollution reaching the receptors, e.g. providing a sealed drainage system.

- 4.1.2 Table 4.1 identifies the risks and describes the control measures in place to ensure that impacts on the receptors are minimised.
- 4.1.3 All staff will receive initial training to ensure that they are aware of the Environmental Management System (EMS) and are familiar with those sections relevant to their role. Refresher training will be given as needed.
- 4.1.4 Records will be maintained of all complaints, incidents and near misses. These will be reviewed annually to identify trends and inform improvements to the EMS.
- 4.1.5 Daily inspections will be made around the outside of the MRF to ensure that dust, noise, odour and litter are being effectively controlled. Should these inspections indicate that emissions are occurring then the site manager will be informed, the cause will be investigated and suitable mitigation will be instigated.
- 4.1.6 Should it be that the mitigation will require significant investment of resources and may take some time, this will be communicated to local businesses and residents explaining the measures to be implemented and the likely timescales. The public are offered the opportunity of a local liaison group and meetings will be held at a frequency led by the local community.

**Table 4.1: Risks to the Environment and Mitigation Measures**

Hazard	Receptor	Pathway	Consequence	Probability of exposure without mitigation	Overall Risk	Mitigation measures	Residual risk
Dust	Local residents and local businesses	Windblown	Nuisance, potential harm to health (e.g. respiratory irritation)	Medium	Medium	All waste storage and treatment is carried out inside the MRF building. Wheel wash available to be used as needed. Dust damped down if required during dry weather. Site roads properly maintained and swept as necessary. Plant properly maintained to minimise emissions. Dust Management Plan is in place.	Low
Litter	Local wildlife, local residents, local businesses	Windblown	Detriment to the amenity, harm to wildlife, nuisance	Medium	Medium	All vehicles carrying waste to the MRF to be enclosed or sheeted. Waste is unloaded inside building with doors closed. All waste storage and treatment carried out inside the MRF building. Any litter to be collected daily and placed in the appropriate bay inside the building.	Low
Pests/Vermin	Local wildlife, local residence, local businesses	Through the air, across the ground	Detriment to the amenity, potential harm to health (e.g. spread of disease), nuisance	Low	Low	All waste will be stored and treated inside the MRF building. Waste treated on a first in, first out basis with residual waste removed within 72 hours of receipt. No putrescible waste to be treated which could attract flies.	Low



**Table 4.1: Risks to the Environment and Mitigation Measures**

Hazard	Receptor	Pathway	Consequence	Probability of exposure without mitigation	Overall Risk	Mitigation measures	Residual risk
Noise	Local residents and local businesses	Through the air	Disturbance	Low	Low	Sorting of waste carried out inside a building. Machinery properly maintained and serviced and turned off when not in use. Good traffic management around the site to minimise reversing and idling. Nearest sensitive receptor 370m away.	Low
Odour	Local residents and local businesses	Through the air	Nuisance	Medium	Medium	Waste stored and treated inside a building. Waste treated on a first in, first out basis with residual waste removed within 72 hours of receipt. No putrescible waste to be treated. Odour Management Plan is in place.	Low
Emissions to groundwater	Groundwater beneath the site	Through the ground	Pollution of groundwater	Low	Low	Waste storage and treatment areas fitted with impermeable surfacing and sealed drainage to prevent fugitive emissions. There is the ability to store water in a sealed sump. Waste is stored and treated inside the MRF building minimising rainwater infiltration. Liquids (e.g. oil for plant maintenance) are stored in appropriate containers with secondary containment.	Low
Emissions to	Local water	Infiltration	Pollution of surface	Low	Low	Waste treatment and storage areas are indoors and	Low

**Table 4.1: Risks to the Environment and Mitigation Measures**

Hazard	Receptor	Pathway	Consequence	Probability of exposure without mitigation	Overall Risk	Mitigation measures	Residual risk
surface water	courses with potential to reach Mill River	through the ground, or run off direct to surface water/drains from leaks.	water, harm to wildlife			provided with impermeable surfacing and sealed drainage. There will be a sleeping policeman at entrance of building to prevent any liquid leaving the building. Liquids (e.g. oil for plant maintenance) are stored in appropriate containers with secondary containment.	
Emissions of nitrogen oxides to air	Local residents and workers	Through the air	Risk to human health	Low	Low	Plant serviced and maintained in accordance with manufacturer's recommendations. Compliance with NRM regulations. Where plant is replaced, lower emission models chosen where practicable.	Low
Fire	Local residents or workers	Through the air	Risk to health from smoke inhalation	Medium	Medium	Wastes to be stored in bays with fire resistant bay walls and 1m headroom to minimise the risk of fire spreading. Quantity of combustible waste in line with EA Fire Prevention Plan guidance, waste treated within 72 hours to avoid self-heating. Good housekeeping with fire watch at the end of the day and in case of hot works. Fire detection and suppression systems fitted in building. Fire Prevention Plan is in place.	Low
Fire water	Groundwater	Infiltration	Pollution of	Medium	Medium	The site is provided with impermeable surfacing and	Low

**Table 4.1: Risks to the Environment and Mitigation Measures**

Hazard	Receptor	Pathway	Consequence	Probability of exposure without mitigation	Overall Risk	Mitigation measures	Residual risk
	beneath the site and local water courses	through soil or surface water run-off	groundwater or surface water			sealed drainage. There is the ability to store water in a sealed sump.	
Plant breakdown and equipment failure	Local residents or workers or groundwater or surface water	Air and/or water pollution depending on the nature of the break down	Noise or pollution as a result of breakdown	Low	Low	Preventative maintenance programme in place to ensure all plant and infrastructure is inspected, serviced and maintained. Damaged plant or infrastructure taken out of service until repaired by a competent person. Waste treatment inside a building with impermeable pavement to provide containment. Staff training conducted and only competent staff to operate machinery.	Low

## 5 CONCLUSION

- 5.1.1 The closest commercial and industrial receptor is Brightwell Corner Agricultural Store and Storage Barns, located 160m to the east of the Site, which is buffered from the site by the A12 dual carriage way and vegetation. The closest residential receptor is a property which lies 370m away. Any fugitive dust and noise emissions are likely to dissipate before reaching these receptors.
- 5.1.2 Mill River lies approximately 540m to the south and there are sensitive habitats close to the site including Ipswich Heaths SSSI and areas of deciduous woodland, but measures are in place to contain leachate, dust and litter which will minimise the potential impact.
- 5.1.3 Measures are in place to minimise the risk of emissions from the site, with all operations contained inside a building. The site will operate in accordance with a written Environmental Management System including a Dust Management Plan, Fire Prevention Plan and Odour Management Plan.
- 5.1.4 The MRF will operate in line with guidance on the appropriate measures for non-hazardous and inert waste permitted facilities.
- 5.1.5 The operation of the MRF is not expected to increase the risk over and above the risk already present due to the permitted landfill.

## DRAWINGS



243900

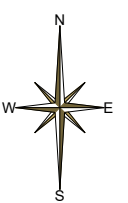
243850

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SITE NAME		FOXHALL LANDFILL	
DRAWING TITLE		MATERIALS RECYCLING FACILITY LAYOUT	
DRAWING NUMBER		FOX-MRF001	
TASK NUMBER		21465	
SCALE	1:500 @ A3	REVISION	
OIDRN	R.L.Meaden	R/IDRN	
Q/DATE	03.08.2023	R/DATE	
Q/APP	L.Edmonds	R/APP	
Q/DATE	03.08.2023	R/DATE	
INFORMATION TAKEN FROM			
SURVEY		SERVICES MASTER FILE	
OTHER DRAWINGS		FOX-MRF2000	
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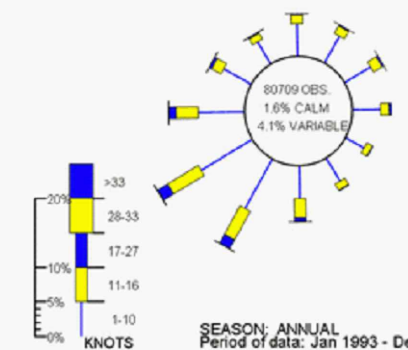


DO NOT SCALE FROM THIS DRAWING

REFERENCE

- SITE BOUNDARY
- 1KM BOUNDARY OFFSET FROM SITE
- COMMERCIAL / INDUSTRIAL RECEPTORS
- RESIDENTIAL RECEPTORS
- DECIDUOUS WOODLAND (PRIORITY HABITAT)
- LEISURE
- SURFACE WATERS
- MAJOR ROAD

WIND ROSE FOR NORWICH AIRPORT  
N.G.R: 6221E 3138N ALTITUDE: 36 metres a.m.s.l.



A	FIRST ISSUE	14/09/23	SJB	DD	AC
REVISION	DETAILS	DATE	DRN	CHK'D	APP'D

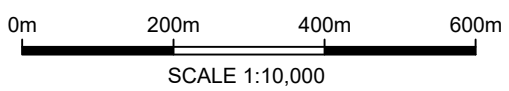
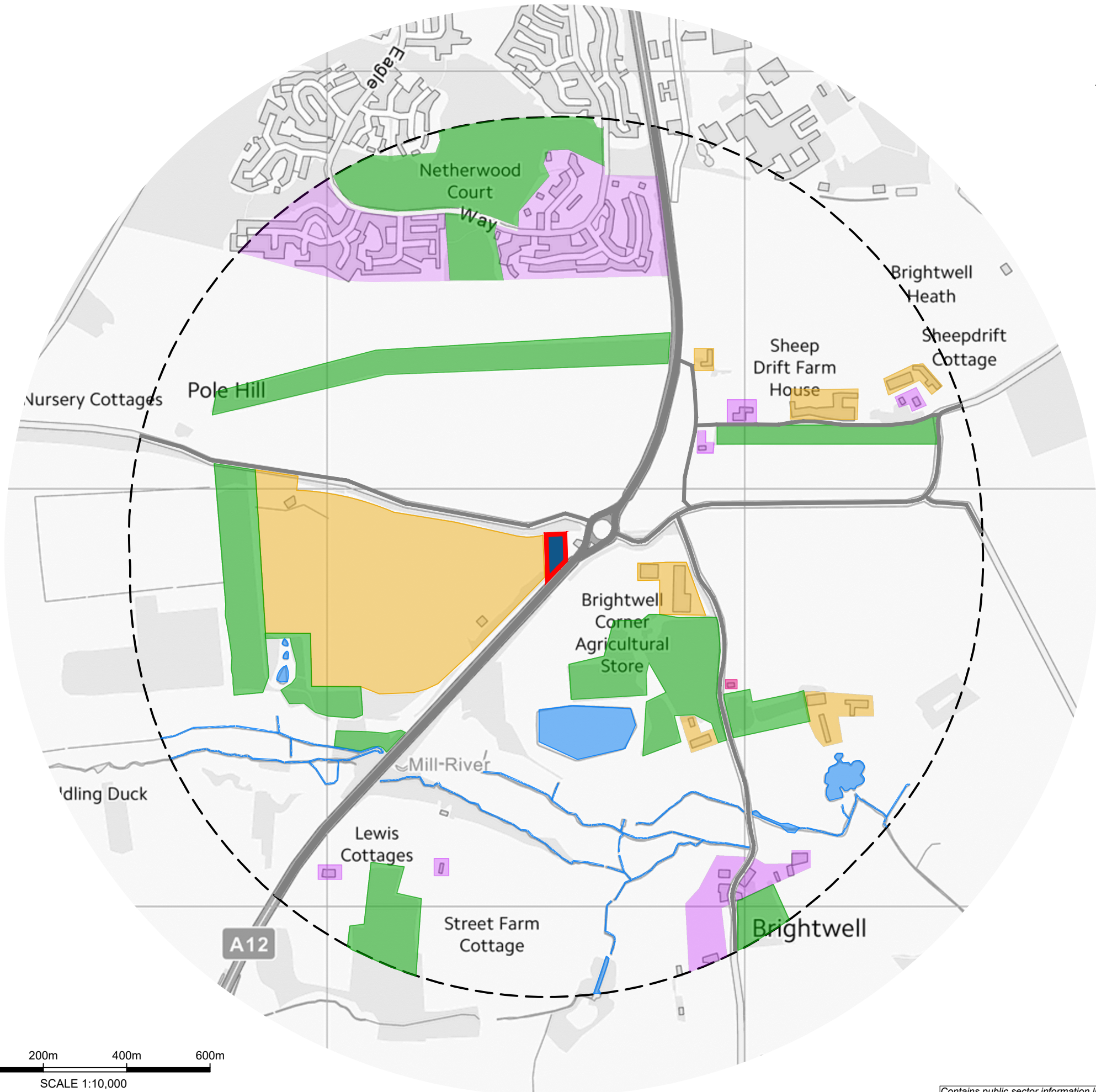
CLIENT  
**VALENCIA WASTE MANAGEMENT LTD**

PROJECT  
**MRF AT FOXHALL, SUFFOLK**

DRAWING TITLE  
**FOXHALL MRF RECEPTOR PLAN**

DRG No.	ST20399-002	REV	A	SUIT. CODE	
DRG SIZE	A3	SCALE	1:10000	DATE	26-07-23
DRAWN BY	DR	CHECKED BY	DD	APPROVED BY	AC





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